



U.S. Department of Justice

United States Attorney  
Southern District of New York

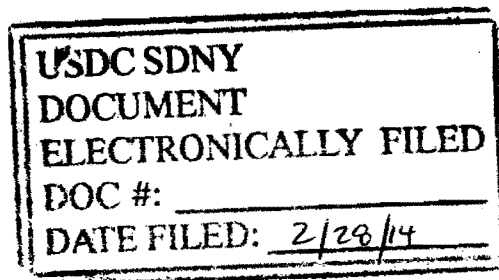
**MEMO ENDORSED**

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 27, 2014

BY HAND

The Honorable Thomas P. Griesa  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Chambers 1630  
New York, New York 10007



Re: United States v. Fadlallah-Cheaitelly et al.  
S4 11 Cr. 133 (TPG)

Dear Judge Griesa:

The Government writes, with the consent of defendants Jorge Fadlallah-Cheaitelly, Jaime Edery, and Roberto Chavez, to respectfully request that the Court adjourn the pretrial conference currently scheduled for March 4, 2014 until May 20, 2014 at 4:30. Fadlallah-Cheaitelly's attorney is currently on trial and therefore unable to attend the conference. In addition, the defendants are reviewing discovery and the parties are discussing pretrial resolutions of this matter.

The Government also moves to exclude from the Speedy Trial Act's operation the time between March 4 and May 20, 2014, in the interests of justice, to ensure continuity of counsel, to afford the defendants adequate time to review discovery, and to afford the parties time to discuss a possible resolution of this matter short of trial. See 18 U.S.C. § 3161(h)(7)(A) & (B)(iv). Defense counsel have expressly consented to such an exclusion on their clients' behalf.

Approved:  
*Thomas P. Griesa*  
USDC  
2/28/14

Respectfully submitted,

PREET BHARARA  
United States Attorney

By:

*Michael Ferrara*  
Michael Ferrara  
Assistant U.S. Attorney  
212-637-2526

Cc: Avraham C. Moskowitz, Esq.; Lawrence M. Herrmann, Esq.; Louis Fasulo, Esq.